

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPH FRAPANPINA III on behalf of)	
Himself and all other similarly situated,)	
)	Case No. 19-cv-00493
Plaintiff,)	
)	
v.)	Judge John Robert Blakey
)	
GARDA CL GREAT LAKES, INC.,)	Magistrate Judge Michael T. Mason
)	
Defendant.)	

**AMENDED JOINT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT
AND CERTIFICATION OF A SETTLEMENT CLASS**

The parties, by their respective counsel, move this Court to preliminarily approve the negotiated settlement and certify a settlement class. In support of this Motion, the parties incorporate herein by reference the Memorandum in Support filed contemporaneously with this motion.

Dated: November 5, 2021

Respectfully submitted,

GARDA CL GREAT LAKES, INC.

JOSEPH FRAPANPINA

By: /s/ Mark L. Shapiro

By: /s/ Terrence Buehler

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CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2021, I electronically filed the foregoing AMENDED JOINT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND CERTIFICATION OF A SETTLEMENT CLASS with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

/s/Terrence Buehler

Terrence Buehler

Counsel for Class Plaintiffs